

EXHIBIT 4

From: [Noah Hagey](#)
To: [Bannigan, Megan K.](#); [Mitchell Stein](#); [Kirsten Dooley](#)
Cc: [Ford, Christopher S.](#); [Cuffman, Timothy](#)
Subject: RE: Tari Labs v. Lightning Labs, 22-7789 (NDCa)
Date: Friday, January 20, 2023 10:53:43 AM

Hi Folks,

Welcome to San Francisco. And welcome to a trademark imbroglio involving such an obvious, well-understood infringement that should have been easily, and costlessly, fixed. Especially where the fight involves parties and management teams who know each other, who have raised money from the same investors, and compete in the same industry, doing very similar things with virtually identical marks. So, welcome.

And also, thank you: for engaging in the same specie of typo-squatting committed by your client and proving the point of our case via a simple, weird email. As one would know from the caption and signature of our complaint, I go by “Noah”, not “Jonas”, and our lead associate is “Kirsten”, not “Kristen”.

It’s confusing, right, all these letters and nuances around names? Also confusing is your client’s efforts to seek another extension while further accelerating its infringing use of Tari’s house mark. Thus, while we hope to extend many professional courtesies in this case, this is not one of them, *i.e.*, absent Lightning Labs agreeing to immediately cease and desist from further efforts to launch, test, publicize or commercialize its infringing TARO platform and protocol. Please advise as soon as possible.

Say hi to David Bernstein for me. Best,

Noah

J. Noah Hagey

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From: Bannigan, Megan K. <mkbannigan@debevoise.com>
Sent: Thursday, January 19, 2023 1:00 PM
To: Noah Hagey <hagey@braunhagey.com>; Mitchell Stein <stein@braunhagey.com>; Kirsten Dooley <dooley@braunhagey.com>
Cc: Ford, Christopher S. <csford@debevoise.com>; Cuffman, Timothy <tcuffman@debevoise.com>
Subject: Tari Labs v. Lightning Labs, 22-7789 (NDCa)

***** EXTERNAL MESSAGE *****

Dear Jonas, Mitchell and Kristen -

As you have likely seen, we just appeared as counsel for Lightning Labs in the above-referenced litigation. We will be replacing counsel from WSGR. I tried to reach you by phone on a few occasions today, but have received only voicemail at both offices. At your convenience, I would like to discuss the case to make sure I better understand your client's position and see if there is an opportunity for resolution.

In light of our appearance today, we also seek your consent for a 14 day extension to respond to the Complaint. Please let us know your position on this today. We plan to move the Court tomorrow morning for the extension if we do not hear from you.

I look forward to working with all of you on this matter.

Best regards,
Megan



Megan K. Bannigan
Partner

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